

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

vs.

MOHAMMED ALI RASHID,

Defendant.

Civ. No. 17-cv-8223 (PKC)

**DEFENDANT'S INITIAL DISCLOSURES
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 26(a)(1)**

Pursuant to Federal Rule of Civil Procedure 26(a)(1) and paragraph 4 of the Court's Case Management Order (Dkt. 23), Defendant Mohammed Ali Rashid ("Mr. Rashid" or "Defendant"), hereby submits the following initial disclosures to Plaintiff Securities and Exchange Commission (the "Commission" or the "SEC").

PRELIMINARY STATEMENT WITH RESPECT TO ALL DISCLOSURES

Defendant makes the following disclosures based on the information reasonably available to him at this time and at this stage of the proceedings. Defendant's investigation into his defenses is ongoing. Pursuant to Federal Rule of Civil Procedure 26(e), Defendant reserves the right to supplement, amend, modify or alter these initial disclosures as new information becomes available, or to the extent the Court's ruling on Defendant's proposed motion to dismiss affects the scope of the claims or defenses in this case.

Defendant's disclosures are made without waiving: (1) any claim of privilege or work product; (2) the right to object on the grounds of competency, relevancy and materiality, hearsay, or any other proper ground, to the use of any disclosed information, for any purpose, in whole or

in part, in any subsequent proceeding in this action or any other action; and (3) the right to object on any and all grounds to any other discovery request or proceeding involving or relating to the subject matter of these disclosures. No incidental or implied admissions are intended by these initial disclosures.

A. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION THAT DEFENDANT MAY USE TO SUPPORT HIS CLAIMS OR DEFENSES

Pursuant to Federal Rule of Civil Procedure 26(a)(1)(A)(i), Defendant discloses the following list of individuals likely to have discoverable information that Defendant may use to support his defenses, their addresses and phone numbers, if known, and the general subject matter(s) of their knowledge. By indicating the general subject matter(s) of information these individuals may possess, Defendant is in no way limiting his right to call any individual listed to testify concerning other subjects.

No.	Name	Title	Area of Knowledge	Contact
1.	Mark Becker	Partner (Apollo)	Apollo's expense policies and procedures and compliance culture (or lack thereof); specific relevant conduct of Defendant, Apollo's management, partners, or employees.	Contact through counsel, believed to be Paul, Weiss
2.	Todd Bellows	Former Employee (Apollo)	Apollo's expense policies and procedures and compliance culture (or lack thereof); specific relevant conduct of Apollo's management, partners, or employees.	Unknown
3.	Lisa Bernstein	Global Head of Human Resources (Apollo)	Apollo's expense policies and procedures and compliance culture (or lack thereof); specific relevant conduct of Defendant, Apollo's management, partners, or employees.	Contact through counsel, believed to be Paul, Weiss

No.	Name	Title	Area of Knowledge	Contact
4.	Leon Black	Chairman and CEO (Apollo)	Employment dispute between Defendant and Apollo; SEC investigation of Apollo and Defendant, Apollo's expense policies and procedures and compliance culture (or lack thereof); specific relevant conduct of Defendant, Apollo's management, partners, or employees.	Contact through counsel, believed to be Paul, Weiss
5.	Gerard Cruse	Former Executive Officer (Apollo)	Apollo's expense policies and procedures and compliance culture (or lack thereof); specific relevant conduct of Defendant, Apollo's management, partners, or employees.	Unknown
6.	Eugene Donnelly	Former CFO (Apollo)	Apollo's expense policies and procedures and compliance culture (or lack thereof); specific relevant conduct of Defendant, Apollo's management, partners, or employees.	Unknown
7.	Seth Dunayer	Accountant/Expense Manager (Apollo)	Employment dispute between Defendant and Apollo; Apollo's expense policies and procedures and compliance culture (or lack thereof); specific relevant conduct of Defendant, Apollo's management, partners, or employees.	Contact through counsel, believed to be Paul, Weiss
8.	Gary Enzor	CEO of Quality Distribution LLC	Business activities involving Defendant; specific relevant conduct of Defendant.	Mobile: (813) 451-0068

No.	Name	Title	Area of Knowledge	Contact
9.	Barbara (Gaudiosi) Feehan	Former Assistant (Apollo)	Apollo's expense policies and procedures and compliance culture (or lack thereof); specific relevant conduct of Defendant, Apollo's partners, or employees.	Unknown
10.	Beth Gastik	Former Assistant (Apollo)	Apollo's expense policies and procedures and compliance culture (or lack thereof); specific relevant conduct of Defendant, Apollo's partners, or employees.	Unknown
11.	Lourenco Goncalves	Former CEO and President of Metals USA	Business activities involving Defendant; specific relevant conduct of Defendant.	Mobile: (216) 533-5322
12.	Josh Harris	Co-Founder and Senior Managing Director (Apollo)	Employment dispute between Defendant and Apollo; SEC investigation of Apollo and Defendant; Apollo's expense policies and procedures and compliance culture (or lack thereof); specific relevant conduct of Defendant, Apollo's management, partners, or employees.	Contact through counsel, believed to be Paul, Weiss
13.	Anthony Hull	CFO of Realogy	Business activities involving Defendant; specific relevant conduct of Defendant.	tony.hall@realogy.com
14.	Sumeera Jones	Former Assistant (Apollo)	Apollo's expense policies and procedures and compliance culture (or lack thereof); specific relevant conduct of Defendant, Apollo's partners, or employees.	Unknown
15.	Farah Khan	Partner at Catterton Partners	Business activities involving Defendant; specific relevant conduct of Defendant.	Mobile: (917) 691-7797 100 W. 18 St New York, NY 10001

No.	Name	Title	Area of Knowledge	Contact
16.	Scott Kleinman	Co-President and Private Equity Lead Partner (Apollo)	Employment dispute between Defendant and Apollo; Apollo's expense policies and procedures and compliance culture (or lack thereof); specific relevant conduct of Defendant.	Contact through counsel, believed to be Paul, Weiss
17.	Nicole LaMons	Former Assistant (Apollo)	Apollo's expense policies and procedures and compliance culture (or lack thereof); specific relevant conduct of Defendant, Apollo's partners, or employees.	Unknown
18.	Glen Leibowitz	Former Employee (Apollo)	Apollo's expense policies and procedures and compliance culture (or lack thereof); specific relevant conduct of Apollo's management, partners, or employees.	Unknown
19.	Cindy Michel	Chief Compliance Officer (Apollo)	Employment dispute between Defendant and Apollo; Apollo's expense policies and procedures and compliance culture (or lack thereof); specific relevant conduct of Defendant, Apollo's management, partners, or employees.	Contact through counsel, believed to be Paul, Weiss
20.	Patricia Navis	Former Associate General Counsel (Apollo)	Apollo's expense policies and procedures and compliance culture (or lack thereof); specific relevant conduct of Defendant, Apollo's management, partners, or employees.	Unknown

No.	Name	Title	Area of Knowledge	Contact
21.	Marc Rowan	Co-Founder and Senior Managing Director (Apollo)	Employment dispute between Defendant and Apollo; SEC investigation of Apollo and Defendant; Apollo's expense policies and procedures and compliance culture (or lack thereof); specific relevant conduct of Defendant, Apollo's management, partners, or employees.	Contact through counsel, believed to be Paul, Weiss
22.	Heather Senn	Former HR Assistant (Apollo)	Apollo's expense policies and procedures and compliance culture (or lack thereof); specific relevant conduct of Defendant, Apollo's management, partners, or employees, Apollo's partners, or employees.	Mobile: (646) 509-1134
23.	John Suydam	Chief Legal Officer (Apollo)	Employment dispute between Defendant and Apollo; SEC investigation of Apollo and Defendant; Apollo's expense policies and procedures and compliance culture (or lack thereof); specific relevant conduct of Defendant, Apollo's management, partners, or employees.	Contact through counsel, believed to be Paul, Weiss
24.	Anthony Tortorelli	Former Employee (Apollo)	Apollo's expense policies and procedures and compliance culture (or lack thereof); specific relevant conduct of Defendant, Apollo's management, partners, or employees.	Unknown
25.	Jessica Triani	Former Assistant (Apollo)	Apollo's expense policies and procedures and compliance culture (or lack thereof); specific relevant conduct of Defendant, Apollo's partners, or employees.	Unknown

No.	Name	Title	Area of Knowledge	Contact
26.	Kenneth Vecchione	Former CFO (Apollo)	Apollo's expense policies and procedures and compliance culture (or lack thereof); specific relevant conduct of Defendant, Apollo's management, partners, or employees.	Unknown
27.	Michael Weiner	Former General Counsel (Apollo)	Apollo's expense policies and procedures and compliance culture (or lack thereof); specific relevant conduct of Apollo's management, partners, or employees.	Ares Capital weiner@aresmgmt.com

In addition to those individuals identified above, Defendant incorporates by reference any witnesses and their possible subjects of testimony disclosed by Plaintiff in its disclosure statements pursuant to Fed. R. Civ. P. 26(a)(1).

B. DOCUMENTS

Pursuant to Federal Rule of Civil Procedure 26(a)(1)(A)(ii), Defendant identifies the following category of documents, electronically stored information, and tangible things currently in his possession, custody, or control that he may use to support his claims or defenses, unless solely for impeachment. Defendant's investigation concerning discoverable information that he may use to support his claims or defenses in this litigation is ongoing, and Defendant reserves his rights to supplement this information as necessary. The below categories of documents, electronically stored information, and tangible things are within the control of Mohammed Ali Rashid, through his counsel, Quinn Emanuel Urquhart & Sullivan, LLP, 51 Madison Avenue, 22nd Floor, New York, NY 10010, and relate to the following subject matters, among others:

- Defendant's business-related expenses while employed at Apollo Global Management, including spreadsheets, communications, invoices, credit card and banking statements, and personal calendars.
- Communications with and documents exchanged between Defendant's former counsel and third parties, including Apollo Global Management and the SEC.
- Communications between Mr. Rashid and Apollo Global Management and/or its representatives.
- Defendant's employment with Apollo Global Management, including travel and expense policies.
- Third-party document productions, including from Apollo Global Management to the SEC.

C. DAMAGES COMPUTATION

Pursuant to Federal Rule of Civil Procedure 26(a)(1)(A)(iii), Defendant is not asserting any counterclaims under which he could seek damages.

D. INSURANCE AGREEMENTS

Pursuant to Federal Rule of Civil Procedure 26(a)(1)(A)(iv), Defendant is not aware of any insurance agreements that would satisfy, indemnify, or reimburse payments related to any final judgment or decree made in this case.

CONCLUSION

Discovery between the Parties concerning the claims at issue in this matter is not complete. Defendant submits the forgoing initial disclosures based on information reasonably available to him and pursuant to Rule 26(e), he reserves the right to amend or supplement these disclosures as discovery and investigation continues.

Dated: February 15, 2018.



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CERTIFICATE OF SERVICE

I, Nora Feher, hereby certify that a true and correct copy of the Defendant's initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) was served upon the following attorneys of record by electronic mail on February 15, 2018:

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